

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
William E Covington and : :
Seneca Covington : No. 21-10693-ELF
Debtors : :

ANSWER TO MOTION OF AJAX MORTGAGE LOAN TRUST 2021-G,
MORTGAGE-BACKED SECURITIES, SERIES 2021-G, BY U.S. BANK NATIONAL
ASSOCIATION, AS INDENTURE TRUSTEE
FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362
AND CERTIFICATE OF SERVICE

1. Debtors missed payments and ask for permission to include the missed payments in an amended plan. The Debtors are able to fund an amended plan.

WHEREFORE Debtors respectfully request this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtors

Dated: 08/24/2022

A copy of this Answer is being served on Jill Manuel-Coughlin, Esquire, and the Chapter 13 Trustee.